

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

The Satanic Temple,

Plaintiff,

v.

City of Belle Plaine, Minnesota,

Defendant.

Case No. 19-CV-01122 (WMW/LIB)

**DECLARATION OF  
MONTE A. MILLS**

I, Monte A. Mills, hereby declare:

1. I am a partner with the law firm of Greene Espel PLLP, and I am one of the attorneys representing the City of Belle Plaine, Minnesota (the “City”) in this matter. I make and submit this declaration based on my personal knowledge of the matters stated herein and in support of the City’s Motion for Summary Judgment.

2. Documents that The Satanic Temple (the “Temple”) initially produced in this litigation were redacted. Because unredacted documents were unavailable to the City, those redacted documents were marked as exhibits during depositions of the Temple’s witnesses, including for the depositions of Lucien Greaves individually and as the Temple’s corporate representative.

3. Following the close of discovery, in December 2020, counsel for the Temple produced a “corrected” set of the Temple’s documents with the redactions removed, including redactions placed over pseudonyms. I have reviewed an analysis

prepared by my colleagues that compares documents from the “corrected” production with the marked deposition exhibits, and this analysis confirms that communications and other documents attached to this declaration at Exs. 9–18, 22, 25 and 28–32 are communications and documents to, from, or involving Lucien Greaves under his second pseudonym.

4. Attached hereto are true and correct copies of excerpts from deposition testimony, deposition exhibits, and other documents cited in the City’s supporting memorandum:

<b>Ex. No.</b>	<b>Description</b>
Exhibit 1:	Excerpts from the deposition testimony of Lucien Greaves, taken Nov. 20, 2020
Exhibit 2:	Excerpts from the deposition testimony of Malcolm Jarry, taken Nov. 23, 2020
Exhibit 3:	Excerpts from the deposition testimony of The Satanic Temple’s (“TST”) Corporate Designee, Lucien Greaves, taken Nov. 30, 2020
Exhibit 4:	Belle Plaine City Council Resolution 17-020 Establishing a Policy Regarding A Limited Public Forum in Veterans Memorial Park (unsigned) (Dep. Ex. 1)
Exhibit 5:	Mar. 29, 2017 Permit issued by the City to Reason Alliance Ltd. (Dep. Ex. 2)
Exhibit 6:	Rendering of TST Veterans Memorial (Dep. Ex. 3)
Exhibit 7:	Feb. 28, 2017 Certificate of Liability Insurance for insured, Reason Alliance, Ltd. (Dep. Ex. 4)

<b>Ex. No.</b>	<b>Description</b>
Exhibit 8:	Belle Plaine City Council Resolution 17-090 Rescinding the Policy and Eliminating the Limited Public Forum in Veterans Memorial Park (Dep. Ex. 5)
Exhibit 9:	Feb. 21–22, 2017 Email exchange among L. Greaves, M. Jarry, and C. Andres re: Subject, Memoria (Dep. Ex. 6)
Exhibit 10:	Mar. 1–2, 2017 Email exchange among C. Andres, M. Jarry, L. Greaves, and others re: Subject, Belle Plaine, MN Veteran’s Memorial—price quote (Dep. Ex. 7)
Exhibit 11:	Apr. 13, 2017 Email from L. Greaves to C. Andres and others re: Subject, Belle Plaine (Dep. Ex. 8)
Exhibit 12:	Apr. 2, 2017 Invoice for Services from L. Greaves to Reason Alliance / TST (Dep. Ex. 9)
Exhibit 13:	Apr. 13–19, 2017 Email exchange among L. Greaves, M. Jarry, A. Astaroth and A. Volpe re: Subject, Fwd: Answers from the designer (Dep. Ex. 10)
Exhibit 14:	Apr. 17–19, 2017 Email exchange among L. Greaves and M. Jarry re: Subject, Fwd: Answers from the designer (Dep. Ex. 11)
Exhibit 15:	June 13, 2017 Email from A. Astaroth to L. Greaves and M. Jarry re: Subject, Fwd: Insurance (Dep. Ex. 12)
Exhibit 16:	June 23, 2017 Email exchange among, A. Astaroth, M. Jarry and A. Volpe re: Subject, Fwd: RE: Finished? (Dep. Ex. 13)
Exhibit 17:	July 15, 2017 Email exchange among A. Astaroth, M. Jarry and L. Greaves re: Subject, Memorial to Salem? (Dep. Ex. 14)
Exhibit 18:	July 19, 2017 Email exchange among A. Astaroth, M. Jarry, and A. Volpe re: Subject, Monument (Dep. Ex. 15)

<b>Ex. No.</b>	<b>Description</b>
Exhibit 19:	July 21, 2017 Invoice from Pretty Hate Machining (A. Volpe) to TST (Dep. Ex. 16)
Exhibit 20:	Photographs of TST's cube display (Dep. Ex. 17)
Exhibit 21:	July 2017–Dec. 2019 Excerpts from L. Greaves Twitter feed (Dep. Ex. 18)
Exhibit 22:	Apr. 13–14, 2014 Email exchange with attachment among L. Greaves, M. Jarry, A. Astaroth, and A. Volpe re: Subject, Hello from Salem Art Gallery (Dep. Ex. 19)
Exhibit 23:	June 22–23, 2017 Email exchange between A. Volpe and A. Astaroth re: Subject, Re: Quick question (Dep. Ex. 20)
Exhibit 24:	July 11–18, 2017 Email exchange among D. Meyer, A. Fahey, and M. Jarry re: Subject, Belle Plaine Vets Park (Dep. Ex. 21)
Exhibit 25:	July 15, 2017 Email exchange among L. Greaves, M. Jarry, and A. Astaroth re: Subject, Memorial to Salem? (Dep. Ex. 22)
Exhibit 26:	Apr. 17, 2017 Transaction detail for payment to A. Volpe (Dep. Ex. 23)
Exhibit 27:	July 21, 2017 Transaction detail for payment to A. Volpe (Dep. Ex. 24)
Exhibit 28:	July 21, 2017 Email invoice from A. Volpe to L. Greaves (Dep. Ex. 26)
Exhibit 29:	July 21, 2017 Email receipt for PayPal payment to A. Volpe (Dep. Ex. 27)
Exhibit 30:	June 4, 2017 Transaction detail for payment to L. Greaves (Dep. Ex. 28)

<b>Ex. No.</b>	<b>Description</b>
Exhibit 31:	July 1, 2017 Transaction detail for payment to L. Greaves (Dep. Ex. 29)
Exhibit 32:	Apr. 19, 2017 Email invoice from C. Andres to L. Greaves (Dep. Ex. 30)
Exhibit 33:	Sept. 24, 2020 Plaintiff's Responses to Defendant's Interrogatories and Requests for Production (Dep. Ex. 31)
Exhibit 34:	Sept. 13, 2019 Plaintiff The Satanic Temple's F.R.C.R. Rule 26(a)(1) Initial Disclosures (Dep. Ex. 32)
Exhibit 35:	Feb. 6, 2017 Belle Plaine Memorandum from M. Votca (CITY000002)
Exhibit 36:	Feb. 21, 2017 Meeting minutes from Belle Plaine City Council Regular Session (CITY000003-7)
Exhibit 37:	Feb. 21, 2017 Belle Plaine City Council Resolution 17-020 Establishing a Policy Regarding A Limited Public Forum in Veterans Memorial Park (CITY000008-10)
Exhibit 38:	Feb. 2017 City's Information and Requirements for Veteran's Memorial Park Limited Public Forum Display Permit, together with Veterans Memorial Park Display Permit Application (CITY000157-159)
Exhibit 39:	June 29, 2017 Email exchange between M. Jarry, M. Votca, and A. Fahey re: Subject, Veterans Memorial Display Permit (CITY000027-30)
Exhibit 40:	July 11, 2017 Email exchange between M. Jarry, and A. Fahey re: Subject, Belle Plaine Vets Park (CITY000055-56)
Exhibit 41:	July 11-14, 2017 Email exchange between A Fahey, D. Meyer, and M. Jarry re: Subject, Belle Plaine Vets Park, with attachment (CITY000068-71)

<b>Ex. No.</b>	<b>Description</b>
Exhibit 42:	July 17, 2017 Meeting minutes from Belle Plaine City Council Regular Session (CITY000072-80)
Exhibit 43:	July 18, 2017 Letter with enclosures from D. Meyer to Reason Alliance Ltd. Meeting minutes from Belle Plaine City Council Regular Session (CITY000085-91)
Exhibit 44:	July 11-18, 2017 Email exchange among M. Jarry, A. Fahey, and D. Meyer re: Subject, Belle Plaine Vets Park Meeting minutes from Belle Plaine City Council Regular Session (CITY000097-100)
Exhibit 45:	July 18, 2017 Statement from the City Meeting minutes from Belle Plaine City Council Regular Session (CITY000103)
Exhibit 46:	Transaction detail reports dated June 4, 2017 and July 1, 2017 (unredacted) (PLF38-39)

I declare under perjury that the foregoing is true and correct and this declaration was executed this 5th day of February, 2021, in the City of Minneapolis, County of Hennepin, State of Minnesota.

s/Monte A. Mills  
Monte A. Mills